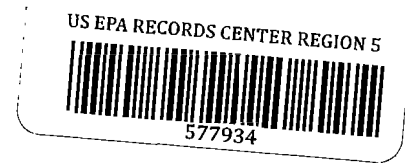


Berkoff, Michael

From: Taylor Morgan, Joy (DEQ) [TAYLORJ1@michigan.gov]
Sent: Thursday, March 14, 2013 12:13 PM
To: Berkoff, Michael
Subject: PCB Volatilization



Hi Michael,

I was directed to you by our Remediation Division. We recently completed a state-wide PCB TMDL (total maximum daily load) for the state of Michigan and at our public meeting we received some questions that we would appreciate EPA's input in answering these questions that will be included in the response to comment document.

The following are the two questions/comments that were made that I was wondering if you could help me compile an appropriate answer since EPA has the lead for these sites.

- 1) Several Allied Paper Portage Creek Kalamazoo River Superfund Site landfills have been or are being remediated with covers. These covers generally incorporate vent layers which provide restricted venting of the underlying PCB contaminated soils to the atmosphere. The landfills are a) Kings Highway in Kalamazoo, which is under MDEQ control; Willow/A Site in Kalamazoo, 12th Street in Plainwell and Bryant Mill in Kalamazoo under the control of EPA. Except for the Bryant Mill site, all EPA landfills are completed or near completion in 2013. Any air sampling of cover, vented landfills is unknown.

Mr. Robert Whitesides, Kalamazoo River Watershed Council

- 2) The Allied Paper Portage Creek Kalamazoo River Superfund Site includes large areas of impounded water in relatively shallow reservoirs, primarily Lake Allegan behind Calkins Bridge Dam, and the impoundment behind Allegan City Dam, that are likely to remain unchanged. Impoundments behind Otsego City, Otsego Township and Trowbridge Dams, which are likely to be removed currently have smaller, but significant surface areas. In addition to surface area that provides atmospheric volatilization potential, PCB contaminated soils formerly submerged sediments on impoundment bottoms, are likely to volatilize PCB to the atmosphere. When the Otsego City, Otsego Township and Trowbridge Dams are removed additional former impoundment sediments will be exposed to atmospheric volatilization. It is unknown if any air sampling has been performed over the existing impoundments or uplands formerly submerged in impoundments. Responsibility for such monitoring and subsequent controls is likely to be through the Potentially Responsible Parties (PRPs) at the direction of EPA.

Mr. Robert Whitesides, Kalamazoo River Watershed Council

My draft answer: Past clean-up at remediation sites have demonstrated that volatilization to the atmosphere is minimal. For example, in the 1999 sediment clean-up efforts for the Fox River in Wisconsin, based on a mass balance study the PCBs that were volatilized during remediation were only 0.4% of the total PCBs removed. Please also see Question 11 below for more details on the King Highway Superfund Site.

Thank you for your assistance.

Regards,
Joy

Joy Taylor Morgan,
MDEQ

Air Quality Division
Toxics Unit
517-335-6974

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